



School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

Transmitted via Electronic Mail

Ms. Kyla L. Townsend-McIntyre
U.S. Environmental Protection Agency, Region III
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Self Disclosure Agreement - AHERA
South Philadelphia High School ULCS #2000

Dear Ms. Townsend-McIntyre

As part of the School District of Philadelphia agreement, effective March 9, 2007 and amended January 18, 2008 with the United States Environmental Protection Agency (EPA), this letter is intended to transmit and certify the Corrective Action Plan (CAP) for the South Philadelphia High School.

This Corrective Action Report was written in accordance with the above noted agreement and the "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy).

As the Responsible Official, I hereby certify that the attached report entitled *CAP – South Philadelphia High School ULCS #2000* submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

If you have any questions or comments please feel free to contact me or Ms. Elizabeth Gutman, Esq.

Sincerely,

A handwritten signature in cursive script that reads "Francine Locke".

Francine Locke, MS
Director, Environmental Management & Services

Attachment 1 – CAP – South Philadelphia High School ULCS #2000

SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN

Updated as of: June 6, 2008

Facility Name: South Philadlephia High School #2000
Facility Address: 2101 S. Broad Street, Philadelphia, PA 19145
Date of Audit: 04/29/08
Date CAP Due to EPA: 6/28/08

| Finding Number | Regulatory Citation | Finding | Corrective Action | Corrective Action Status(include date when closed) | Preventative Measure | Preventative Measures Status (include date when closed) | Extension Filed (Y/N) | Exhibit Reference | Approximate Cost to Close Finding | Potential Reduction of Pollutants *INCLUDE AMT OF OIL |
|--|------------------------------|--|--|---|--|---|-----------------------|-------------------|-----------------------------------|---|
| ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E | | | | | | | | | | |
| 1 | (40 CFR § 763.85(b)) | The school is required to complete Three Year Re-inspections. Minor data gaps were identified following the 2000 and 2004 Three Year Re-inspections, ranging from 1 - 2 months | The school must complete the Re-inspections every 3 years. This is a historical finding as the school can not complete missing data gaps. | Historical finding. Corrective Action can not be completed. | Implement the schedule and track the Three Year Re-inspection in a compliance calendar. | In Progress - A written schedule/outline for the Six month and Three Year Re-inspections was created by Mr. Michael Copper, AHERA Coordinator and has been incorporated into the management plan. A draft compliance calendar was created by URS for tracking the Three Year Re-inspection and is currently being reviewed by the School District. | N | 1 | N/A | Recordkeeping violation |
| 2 | (40 CFR § 763.85(b)(1)(vii)) | The regulations require that the Three Year Re-inspections records be updated within 30 days of the inspection. The most recent Re-inspection Report is dated December 2006 and was available for review at the central file and the school building, however it was recently printed/distributed and was not completed within the required 30 day time frame from the inspection date in December 2006. | The Three Year Re-inspection records must be updated within 30 days of the actual inspection. This is a historical finding. | Historical finding. Corrective Action can not be completed. | Implement and track the Re-inspection date in a compliance calendar so that the 30 day update can be tracked by personnel in the central office for the next Three Year Re-inspection in 2009. | In Progress - A draft compliance calendar was created by URS for the 30 day tracking of the Three Year Re-inspections and is currently being reviewed by the School District. | N | 2 | N/A | Recordkeeping violation |
| 3 | (40 CFR § 763.94)(d) | The school is required to complete Six Month Periodic Surveillance Inspections. Varied data gaps exist between the Six Month Periodic Surveillance Inspections 1989-2007, ranging from 2-17 months. | The school must complete Periodic Surveillance Inspections every 6 months. This is a historical finding as the school can not complete past missed inspections. | Historical finding. Corrective Action can not be completed. | Implement the schedule and track the Six Month Periodic Surveillance Inspection in a compliance calendar. | In Progress - A draft compliance calendar was created by URS for tracking the Six Month Inspections and is currently being reviewed by the School District. | N | 3 | N/A | Recordkeeping violation |
| 4 | (40 CFR § 763.94) | The regulations require the school to maintain all Operations and Maintenance (O&M) records, only partial records were found at the school. | Prepare copies of the missing O&M records and distribute to the administration office for inclusion in the management plan. The following reports were not found at the school. USA 07-010001-202 9/11/07 USA 07-010001-213 9/11/07 Synertech 010-2620 3/30/06 USA 07-010001-211 8/20/07 ETC A07-0523-01 5/23/07 ETC A07-0523-02 5/23/07 | Closed 6/6/08 - Copies of the missing response actions were prepared by the School District and distributed to the School for their records. | A letter should be sent to all school administrators reminding them of the AHERA record keeping procedures and the importance of maintaining all asbestos documentation. | Closed 6/6/08 -The Re-inspection Reports were submitted with a letter titled "AHERA Compliance Update Reports" from the Office of Capital Programs regarding the importance of maintaining these reports with the management plan records. | N | 4 | \$600 | Recordkeeping violation |
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School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

June 2, 2008

Ms. Alice Heller
South Philadelphia High School
2101 S. Broad Street
Philadelphia, PA 19148

Re: Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit
Documentation Related to Corrective Action Plan

Dear Ms. Heller:

Following the AHERA Environmental Compliance Audit conducted at the South Philadelphia High School on April 29, 2008 the attached documents have been prepared for inclusion into the AHERA environmental management plan at your school and at the Environmental Library located at 440 N. Broad Street.

The following documents were prepared for the South Philadelphia High School and must be kept with the AHERA environmental management plan records:

Exhibit 4 – The Response Action Reports not found at the school during the audit

Secretary
~~School Principal:~~

Print Name: *Beverly Pintarelli*

Sign Name: *Beverly Pintarelli*

Date: *6/6/08*

Witnessed by:

Title: *VRS*

Print Name: *Brian Joseph*

Sign Name: *B. Joseph*

Date: *6/6/08*

If you have any questions or comments, please feel free to contact Francine Locke at 215-400-4750 or Jerry Junod at 215 400-6738.

Sincerely,

Francine Locke

Francine Locke, MS
Director, Environmental Management & Services

School District of Philadelphia
Asbestos Hazard Emergency Response Act (AHERA)
Compliance Audit

Principal Interview Form

The School District of Philadelphia (School District) and the U.S. Environmental Protection Agency, Region III (EPA) entered into a Self-Audit/Self Disclosure Agreement. The purpose of the agreement is to gauge the School District's compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for your school/ facility.

The School District obtained the services of URS Corporation (URS) to conduct the AHERA environmental compliance audit. The audit will focus on the compliance of general information, inspections and reinspections, response actions, operations and maintenance, periodic surveillance, and notifications. This document acknowledges that all environmental documents relevant to the building asbestos management plan have been made available to URS at the time of the audit.

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|--------------------------|--------------------------------------|
| School/ Facility: | South Philadelphia High School #2000 |
| Address: | 2101 Broad Street |
| Date of Audit: | 4/29/08 |

School Principal:

Print Name: G.J. LASKOWSKI

Sign Name: [Signature]

Date: 4/29/08